

ARNOLDO CASILLAS, ESQ., SBN 158519
CASILLAS & ASSOCIATES
3777 Long Beach Blvd., Third Floor
Long Beach, CA 90807
PH: (562) 203-3030
FX: (323) 725-0350

Attorneys for Plaintiffs:
ESTATE OF ANDY LOPEZ, by and through
successors in interest, RODRIGO LOPEZ and
SUJAY CRUZ, and RODRIGO LOPEZ and
SUJAY CRUZ, individually

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ESTATE OF ANDY LOPEZ, et al.,

Plaintiff,

vs.

ERICK GELHAUS, et al,

Defendants.

Case Number: 13-CV-05124-PJH

**JOINT CASE MANAGEMENT
CONFERENCE STATEMENT**

Date: September 20, 2018

Time: 2:00 p.m.

Dept: Ctrm 3-3rd Flr.

Judge: Hon. Phyllis J. Hamilton

TO THE HONORABLE CLERK OF THE COURT:

The parties, through their respective attorneys of record, hereby submit the following Joint Case Management Statement in preparation for the Case Management Conference currently set for September 20, 2018.

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1 The parties respectfully submit that they met and conferred on Wednesday,
2 September 5, 2018, regarding outstanding issues related to the above matter and a
3 reasonable trial schedule.

4 The following summarizes the discussion and proposal that counsel for the parties
5 reached:

6 **1. Outstanding Discovery:**

7 At the time Defendants County of Sonoma and Erick Gelhaus filed their Notice of
8 Appeal on or about February 4, 2016, the parties had completed all factual
9 discovery and had started conducting expert discovery. The parties had completed
10 eight expert depositions, with six experts yet to be deposed. The parties agree to
11 complete the depositions of all experts. The parties anticipate completing these
12 depositions within the next ninety (90) days.
13

14 **2. Mediation:**

15 Counsel for the parties further discussed participating in a mediation/settlement
16 conference. Counsel discussed private mediators as well as a magistrate judge and
17 anticipate completion of a mediation also within the next ninety (90) days.

18 **3. Trial Date:**

19 Counsel discussed a reasonable trial date and based on the current trial calendars
20 for all counsel of record, counsel has agreed to a trial date starting July 29, 2019, or
21 August 5, 2019, depending upon the availability of the Court and the Court's input.
22

23 Dated: September 13, 2018

CASILLAS & ASSOCIATES

24 By: /s/ Arnolando Casillas
25 ARNOLDO CASILLAS
26 Attorneys for Plaintiffs:
27 Estate of Andy Lopez, Rodrigo Lopez and
28 Sujay Cruz

1 Dated: September 13, 2018

MESSNER REEVES LLP

2 By: /s/ Jesse F. Ruiz

3 JESSE F. RUIZ

4 Attorneys for Defendants

5 Erick Gelhaus and County of Sonoma

6 Dated: September 13, 2018

7 McNAMARA, NEY, BEATTY, SLATTERY,
8 BORGES & AMBACHER LLP

9 By: /s/ Noah G. Blechman

10 NOAH G. BLECHMAN

11 Attorneys for Defendants

12 Erick Gelhaus and County of Sonoma
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